

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FUND LIQUIDATION HOLDINGS LLC, as assignee
and successor-in-interest to FrontPoint Asian Event
Driven Fund L.P., on behalf of themselves and all oth-
ers similarly situated,

Plaintiff,

v.

CITIBANK, N.A., BANK OF AMERICA, N.A.,
JPMORGAN CHASE BANK, N.A., THE ROYAL BANK
OF SCOTLAND PLC, UBS AG, BNP PARIBAS, S.A.,
OVERSEA-CHINESE BANKING CORPORATION
LTD., DEUTSCHE BANK AG, CREDIT AGRICOLE
CORPORATE AND INVESTMENT BANK, CREDIT
SUISSE AG, STANDARD CHARTERED BANK, DBS
BANK LTD., UNITED OVERSEAS BANK LIMITED,
AUSTRALIA AND NEW ZEALAND BANKING
GROUP, LTD., THE BANK OF TOKYO-MITSUBISHI
UFJ, LTD., THE HONGKONG AND SHANGHAI
BANKING CORPORATION LIMITED, AND JOHN
DOES NOS. 1-50,

Docket No.: 1:16-cv-05263-AKH

Defendants.

**DECLARATION OF MANUEL F. GOMEZ IN SUPPORT OF
CREDIT SUISSE AG'S MOTION TO DISMISS**

I, Manuel F. Gomez, hereby declare:

1. I am a Vice President in the Cross-Border Litigation and Investigations Group of Credit Suisse Securities (USA) LLC, and make this declaration in further support of Credit Suisse AG's ("CSAG") motion to dismiss the above-captioned action for lack of personal jurisdiction as counsel for CSAG. I set forth the facts below to the best of my knowledge based upon my review of CSAG's records.

2. CSAG is a financial institution incorporated under the laws of Switzerland. Its headquarters is and has been located at Paradeplatz 8, Zurich, Switzerland. CSAG's principal place of business is and has been Switzerland.

3. CSAG has 21 branches and 14 representative offices outside Switzerland.

4. In the United States, CSAG has a New York branch and two representative offices in California.

5. CSAG has direct and indirect subsidiaries in the United States.

6. Based on the most recent Credit Suisse Group AG & Credit Suisse AG Annual Report, in 2017, a minority of CSAG's consolidated net revenue (including net revenues of all direct and indirect subsidiaries) was attributable to the United States. Upon information and belief, the figures for October 2018 are substantially similar for all purposes relevant to the current motion to dismiss.

7. Based on the most recent Credit Suisse Group AG & Credit Suisse AG Annual Report, in 2017, CSAG reported 12,090 full-time equivalent employees, 7,500 full-time equivalent employees in Switzerland, and 4,590 full-time equivalent employees elsewhere. In the United States, CSAG employed 89 people (each of which was employed by the New York Branch).

8. During the time period relevant to this litigation (January 1, 2007 to December 31, 2011), CSAG did not trade SGD SIBOR-based derivatives that are relevant to this litigation, such as interest rate swaps or forward rate agreements, in the United States or with U.S.-based counterparties.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15 day of November 2018 in New York, New York.

By: 

MANUEL F. GOMEZ